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Attorneys for Defendant  
ABDULLAH LIMITED COMPANY,  
BINOTECH LLC, and HIK TECH LLC

IN THE UNITED STATES DISTRICT COURT FOR  
THE CENTRAL DISTRICT OF CALIFORNIA

JOANNA ARDALAN, ESQ, an  
individual; ONE LLP, a California Limited  
Liability Partnership,

Plaintiffs,

vs.

BINOTECH LLC; KAREN MUMMERT;  
MICHAEL MUMMERT; ABDULLAH  
LIMITED COMPANY; CODERS CUBE  
LLC; HIK TECH LLC; DATA PATCH,  
INC.; DOE 1, d.b.a. LAW INTEGRAL,  
LLC, business entity unknown; DOE 2,  
d.b.a. DEPUTY TRADEMARK, business  
entity unknown; DOE 3, p.k.a.  
MICHELLE SPRAGUE, an individual;  
DOE 4, d.b.a. TRADEMARK INTEGRAL,  
business entity unknown; DOE 5, d.b.a.  
BRANDREGISTRATION.ORG, business  
entity unknown; and DOES 6 through 10,  
inclusive,

Defendants.

Case No. 8:23-cv-01243-KK-DFM

**DEFENDANTS' ANSWER TO  
THE FIRST AMENDED  
COMPLAINT**

U.S. District Judge:  
Kenly Kiya Kato  
U.S. Magistrate Judge:  
Douglas F. McCormick

Courtroom: 3  
3470 12th Street, Riverside,  
California 92501

Complaint filed: July 12, 2023  
Default taken: October 25, 2024

**DEFENDANTS DEMAND TRIAL  
BY JURY**

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS:

Defendants BINOTECH LLC, HIKTECH LLC and ABDULLAH LIMITED  
COMPANY (collectively, the "Answering Defendants") hereby respond as follows to

1 the Complaint (Dkt. No. 29) filed by Plaintiffs JOANNA ARDALAN, ESQ, and ONE  
2 LLP. The Answering Defendants have concurrently filed a Motion to Set Aside the  
3 Default (Dkt. No. 50). The Answering Defendants specifically deny all allegations  
4 not expressly admitted below.

5 **PRELIMINARY STATEMENT**

6 1. Deny.

7 **JURISDICTION AND VENUE**

8 2. Paragraph 2 of the FAC states legal conclusions to which no response is  
9 required.

10 3. Paragraph 3 of the FAC states legal conclusions to which no response is  
11 required.

12 4. Paragraph 4 of the FAC states legal conclusions to which no response is  
13 required. In regards to the allegations regarding Defendant Trademark Deputy, the  
14 Answering Defendants lack sufficient information or knowledge to admit or deny the  
15 allegations and therefore denies them. In regards to the allegations that Defendants  
16 have provided legal services under the guise that they are members of the California  
17 State Bar, the Answering Defendants deny.

18 **PARTIES**

19 5. The Answering Defendants lack sufficient information or knowledge to  
20 admit or deny the allegations and therefore denies them.

21 6. The Answering Defendants lack sufficient information or knowledge to  
22 admit or deny the allegations and therefore denies them.

23 7. Admit.

24 8. The Answering Defendants lack sufficient information or knowledge to  
25 admit or deny the allegations and therefore denies them.

26 9. The Answering Defendants lack sufficient information or knowledge to  
27 admit or deny the allegations and therefore denies them.

28 10. There is no paragraph 10 in the FAC.

1 11. Admit.

2 12. The Answering Defendants lack sufficient information or knowledge to  
3 admit or deny the allegations and therefore denies them.

4 13. Admit.

5 14. The Answering Defendants lack sufficient information or knowledge to  
6 admit or deny the allegations and therefore denies them.

7 15. The Answering Defendants lack sufficient information or knowledge to  
8 admit or deny the allegations and therefore denies them.

9 16. The Answering Defendants lack sufficient information or knowledge to  
10 admit or deny the allegations and therefore denies them.

11 17. The Answering Defendants lack sufficient information or knowledge to  
12 admit or deny the allegations and therefore denies them.

13 18. The Answering Defendants lack sufficient information or knowledge to  
14 admit or deny the allegations and therefore denies them.

15 19. The Answering Defendants lack sufficient information or knowledge to  
16 admit or deny the allegations and therefore denies them.

17 20. The Answering Defendants lack sufficient information or knowledge to  
18 admit or deny the allegations and therefore denies them.

19 **COMMON FACTS TO ALL COUNTS**

20 *Plaintiffs' Business as a Prominent Intellectual Property*

21 *Litigation Partner and Law Firm*

22 21. The Answering Defendants lack sufficient information or knowledge to  
23 admit or deny the allegations and therefore denies them.

24 22. The Answering Defendants lack sufficient information or knowledge to  
25 admit or deny the allegations and therefore denies them.

26 23. The Answering Defendants lack sufficient information or knowledge to  
27 admit or deny the allegations and therefore denies them.

28 24. The Answering Defendants lack sufficient information or knowledge to

1 admit or deny the allegations and therefore denies them.

2 *Defendants' Business as a "Virtual Law Firm"*

3 25. The Answering Defendants lack sufficient information or knowledge to  
4 admit or deny the allegations and therefore denies them. For purposes of answering  
5 the FAC, the Answering Defendants visited "lawintegral.com" and were directed to a  
6 "GoDaddy" webpage indicating that "The domain name LawIntegral.com is for sale!";  
7 the address "deputytrademark.com" directs to a page stating "This site can't be  
8 reached."; and the address "trademarkintegral.com" similarly results in a page stating  
9 "This site can't be reached."

10 26. The Answering Defendants lack sufficient information or knowledge to  
11 admit or deny the allegations and therefore denies them because the website  
12 "lawintegral.com" can no longer be reached.

13 27. The Answering Defendants lack sufficient information or knowledge to  
14 admit or deny the allegations and therefore denies them because the website  
15 "lawintegral.com" no longer exists. As to the allegation that "Plaintiffs looked up  
16 Defendant Sprague," the Answering Defendants lack sufficient information or  
17 knowledge as to what searches Plaintiffs have completed.

18 28. The Answering Defendants lack sufficient information or knowledge to  
19 admit or deny the allegations and therefore denies them because the website  
20 "Deputytrademark.com" can no longer be reached.

21 29. The Answering Defendants lack sufficient information or knowledge to  
22 admit or deny the allegations and therefore denies them because the website  
23 "Trademarkintegral.com" can no longer be reached.

24 30. As to the Answering Defendants, deny, the Answering Defendants lack  
25 sufficient information or knowledge to admit or deny the allegations as they relate to  
26 the other Defendants.

27 31. The Answering Defendants lack sufficient information or knowledge  
28 regarding what subpoenas Plaintiffs issued or what information Plaintiffs discovered,

1 and therefore cannot answer these allegations.

2 32. As to the Answering Defendants, deny.

3 *Defendants Unlawful Activities*

4 33. As to the Answering Defendants, deny.

5 34. The Answering Defendants lack sufficient information or knowledge as  
6 to if, how or when Plaintiffs were “alerted” and therefore denies these allegations.

7 35. The Answering Defendants lack sufficient information or knowledge to  
8 admit or deny the allegations and therefore denies them.

9 36. The Answering Defendants lack sufficient information or knowledge to  
10 admit or deny the allegations and therefore denies them.

11 37. The Answering Defendants lack sufficient information or knowledge to  
12 admit or deny the allegations and therefore denies them.

13 38. The Answering Defendants lack sufficient information or knowledge to  
14 admit or deny the allegations and therefore denies them.

15 39. The Answering Defendants lack sufficient information or knowledge to  
16 admit or deny the allegations and therefore denies them.

17 40. The Answering Defendants lack sufficient information or knowledge to  
18 admit or deny the allegations and therefore denies them.

19 41. As to the Answering Defendants, deny.

20 42. As to the Answering Defendants, deny.

21 43. As to the Answering Defendants, deny.

22 **FIRST CAUSE OF ACTION**

23 **Infringement of the Right of Publicity, Common Law**

24 **and Cal. Civil Code §3344**

25 **(By Plaintiff Ardalan Against All Defendants)**

26 44. Defendants incorporate all of their other denials as though stated here.

27 45. As to the Answering Defendants, deny.

28 46. As to the Answering Defendants, deny.

1 47. As to the Answering Defendants, deny.

2 48. As to the Answering Defendants, deny.

3 **SECOND CAUSE OF ACTION**

4 **Unfair Competition Under California Business And Professions Code §§17200**  
5 **et seq.**

6 **(By Plaintiffs Against All Defendants)**

7 49. Defendants incorporate all of their other denials as though stated here.

8 50. As to the Answering Defendants, deny.

9 51. As to the Answering Defendants, deny.

10 52. As to the Answering Defendants, deny.

11 53. As to the Answering Defendants, deny.

12 54. As to the Answering Defendants, deny.

13 55. As to the Answering Defendants, deny.

14 **THIRD CAUSE OF ACTION**

15 **Unfair Competition Under California Common Law**

16 **(By Plaintiffs Against All Defendants)**

17 56. Defendants incorporate all of their other denials as though stated here.

18 57. As to the Answering Defendants, deny.

19 58. As to the Answering Defendants, deny.

20 59. As to the Answering Defendants, deny.

21 60. As to the Answering Defendants, deny.

22 **FOURTH CAUSE OF ACTION**

23 **Trademark Infringement, 15 U.S.C. § 1114**

24 **(By Plaintiff ONE Against All Defendants)**

25 61. Defendants incorporate all of their other denials as though stated here.

26 62. Admit that this allegation is set forth in the foregoing paragraphs, but the  
27 Answering Defendants lack sufficient information or knowledge to verify this  
28 allegation.

63. The Answering Defendants lack sufficient information or knowledge to admit or deny the allegations and therefore denies them.

64. As to the Answering Defendants, deny.

65. As to the Answering Defendants, deny.

66. As to the Answering Defendants, deny.

67. As to the Answering Defendants, deny.

68. As to the Answering Defendants, deny.

69. As to the Answering Defendants, deny.

70. As to the Answering Defendants, deny.

**FIFTH CAUSE OF ACTION**

**Trademark Counterfeiting, 15 U.S.C. § 1116**

**(By Plaintiff ONE Against All Defendants)**

71. Defendants incorporate all of their other denials as though stated here.

72. Paragraph 72 of the FAC states legal conclusions to which no response is required.

73. Paragraph 73 of the FAC states legal conclusions to which no response is required

74. As to the Answering Defendants, deny.

75. As to the Answering Defendants, deny.

76. As to the Answering Defendants, deny.

77. As to the Answering Defendants, deny.

78. As to the Answering Defendants, deny.

79. As to the Answering Defendants, deny.

80. As to the Answering Defendants, deny.

81. As to the Answering Defendants, deny.

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**SIXTH CAUSE OF ACTION**

**False Designation of Origin/Unfair Competition, 15 U.S.C. § 1125(a)**

**(By Plaintiff ONE Against All Defendants)**

82. Defendants incorporate all of their other denials as though stated here.

83. The Answering Defendants lack sufficient information or knowledge to admit or deny the allegations and therefore denies them.

84. As to the Answering Defendants, deny.

85. As to the Answering Defendants, deny.

86. As to the Answering Defendants, deny.

87. As to the Answering Defendants, deny.

88. As to the Answering Defendants, deny.

**PRAYER FOR RELIEF**

Defendants deny that Plaintiffs are entitled to any of the requested relief.

**FIRST AFFIRMATIVE DEFENSE**

(Mistake)

89. As a first affirmative defense, Defendants allege the FAC and every cause of action contained therein is barred by mistake that the Answering Defendants are not the correct party to be named based on their address and information being misappropriated.

**SECOND AFFIRMATIVE DEFENSE**

(Laches)

90. As a second affirmative defense, Defendants allege the Complaint and every cause of action contained therein is barred by unreasonable delay in pursuing any claim for damages, equitable relief or an accounting.

**THIRD AFFIRMATIVE DEFENSE**

(Failure to Mitigate Damages)

91. As a third affirmative defense, Defendants allege the Complaint and every cause of action therein, as well as any right to recover damages, is barred, or



alternatively shall be reduced in amount, by Plaintiffs' failure to mitigate damages.

**FOURTH AFFIRMATIVE DEFENSE**

(Failure to Allege Sufficient Facts)

92. As a fourth affirmative defense, Defendants allege the Complaint and every cause of action therein, fail to state sufficient facts to constitute a claim.

Wherefore, Defendants pray:

1. Plaintiff take nothing by virtue of its complaint;
2. For costs of suit and attorney's fees; and
3. For such further proper relief.

Respectfully submitted,

FLYER & FLYER, A PROFESSIONAL  
LAW CORPORATION

/s/ David R. Flyer

Dated: November 25, 2024

By:

David R. Flyer  
Raquel Flyer Dachner  
Attorneys for  
Defendants ABDULLAH LIMITED  
COMPANY, BINOTECH LLC, and HIK  
TECH LLC

**DEFENDANT DEMANDS TRIAL BY JURY**